

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 21-30589 (JCW)

**MOTION FOR ADMISSION *PRO HAC VICE* FOR CAITLIN K. CAHOW**

I, John R. Miller, Jr., am a partner with the law firm Rayburn Cooper & Durham, P.A. and am a member in good standing of the bar of this Court. Pursuant to the admission requirements of Rule 2090-2 of the Local Rules of this Court (the “Local Bankruptcy Rules”) and Rule 83.1 of the Local Rules for Procedure and Practice of the United States District Court for the Western District of North Carolina, I move for the *pro hac vice* admission of Caitlin K. Cahow to practice in this Court for the purpose of representing LTL Management LLC, as debtor (the “Debtor”), in the above-captioned case. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Ms. Cahow is an associate of the law firm of Jones Day, with her office located at 77 West Wacker, Suite 3500, Chicago, Illinois 60601. Ms. Cahow's telephone number is (312) 782-3939, and her facsimile number is (312) 782-8585. Ms. Cahow's e-mail address is ccahow@jonesday.com.

2. An application has been filed or will be filed shortly requesting the retention of Jones Day as bankruptcy counsel for the Debtor pursuant to section 327(a) of

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

the Bankruptcy Code. A further application has been filed or will be filed shortly requesting the appointment and retention of Rayburn Cooper & Durham, P.A. as local bankruptcy counsel.

3. As stated in the Declaration of Caitlin K. Cahow, which is attached hereto as Exhibit A and incorporated herein by reference, Ms. Cahow is a member in good standing of the Bar of the State of Illinois and is admitted to practice in the United States District Court for the Northern District of Illinois. Further, as set forth in her Declaration, Ms. Cahow is experienced in bankruptcy matters and is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules.

4. With reference to all matters incident to this case, Ms. Cahow submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the Western District of North Carolina for any alleged misconduct that occurs in the course of this chapter 11 case.

5. The \$281.00 fee for admission *pro hac vice* is being submitted concurrently with the filing of this Motion, consistent with Local Bankruptcy Rule 2090-2(c)(1).

WHEREFORE, the movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Caitlin K. Cahow to appear before the Court *pro hac vice* in this case.

Dated: October 14, 2021  
Charlotte, North Carolina

Respectfully submitted,

/s/ John R. Miller, Jr.

C. Richard Rayburn, Jr. (NC 6357)

John R. Miller, Jr. (NC 28689)

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PROPOSED ATTORNEYS FOR DEBTOR

**EXHIBIT A**

Declaration of Caitlin K. Cahow

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 21-30589 (JCW)

**DECLARATION OF CAITLIN K. CAHOW  
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Caitlin K. Cahow, in support of the *Motion for Admission Pro Hac Vice for Caitlin K. Cahow* (the “Motion”),<sup>2</sup> declares as follows:

1. My name is Caitlin K. Cahow, and I am an associate with the law firm of Jones Day, with my office located at 77 West Wacker, Suite 3500, Chicago, Illinois 60601. My telephone number is (312) 782-3939, and my facsimile number is (312)782-8585. My e-mail address is ccahow@jonesday.com.

2. I have read the Motion and understand the contents thereof. The matters and statements alleged therein are true and correct to the best of my knowledge, information and belief.

3. I am a member in good standing of the Bar of the State of Illinois, and I am admitted to practice before the United States District Court for the Northern District of Illinois.

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

4. I have never been disbarred or suspended in any court in which I am admitted to practice.

5. I have not been the subject of disciplinary action by the bar or courts of any state.

6. I am experienced in bankruptcy matters and am familiar with the provisions of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure. I have obtained a copy of the Local Bankruptcy Rules and am generally familiar with such rules.

7. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course of this chapter 11 case.

8. The law firm of Rayburn Cooper & Durham, P.A. is proposed local bankruptcy counsel for the Debtor in this case.

9. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: October 14, 2021

/s/ Caitlin K. Cahow

Caitlin K. Cahow

**EXHIBIT B**

Proposed Order

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No. 21-30589 (JCW)

**ORDER ALLOWING CAITLIN K. CAHOW TO  
APPEAR AS COUNSEL FOR DEBTOR, *PRO HAC VICE***

This matter having come before the undersigned Judge of the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division, upon the *Motion for Admission Pro Hac Vice for Caitlin K. Cahow* (the “Motion”) filed by John R. Miller, Jr. for the admission *pro hac vice* of Caitlin K. Cahow, to practice in this Court for the purposes of representing the above-captioned debtor (the “Debtor”) in the above-captioned case as co-counsel together with counsel from the law firm of Rayburn Cooper & Durham, P.A. who

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are admitted to practice in this Court; and it appearing to the Court, and the Court so finding, that for good cause shown the Motion should be granted;

NOW, THEREFORE, IT IS HERBY ORDERED THAT, pursuant to Rule 2090-2 of the Local Rules of Practice and Procedure of this Court, Caitlin K. Cahow shall be, and hereby is, admitted *pro hac vice* to practice in this Court in the above-captioned chapter 11 case.

This Order has been signed electronically.  
The Judge's signature and Court's seal appear at the top of the Order.

United States Bankruptcy Court